

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

IAN WALLACE,

Plaintiff,

vs.

PHARMA MEDICA RESEARCH, INC.,

Defendant.

)
)
)
)
)
)
)
)
)
)

Case No. 4:18-cv-01859 PLC

DEFENDANT’S MOTION FOR STIPULATED PROTECTIVE ORDER

COMES NOW Defendant, Pharma Medica Research, Inc., by and through its undersigned attorneys, Hinshaw & Culbertson LLP and Terese A. Drew, and move this Court to enter an order of protection under Fed. R. Civ. P. 26(c), and for such Motion, states as follows:

1. Disclosure and discovery activity in this proceeding may involve production of confidential, proprietary, and private information for which special protection from public disclosure and from use for any purpose other than prosecuting this litigation would be warranted.

2. Plaintiff has sought production of various documents, including medical information and company contracts, rules, regulations, procedures, protocols, guidelines, standards, manuals, and instructions related to Defendant’s clinical testing.

3. A protective order is authorized under Fed. R. Civ. P. 26(c).

4. Defendant has attached a proposed Stipulated Protective Order. *See* Exhibit A.

5. All parties have agreed to the proposed Stipulated Protective Order.

6. All parties will be benefited by the Court entering a Protective Order as it pertains to this case.

WHEREFORE, Defendant respectfully requests that this Court enter the Stipulated Protective Order prohibiting the use of any documents outside of the terms stipulated to under the Protective Order.

HINSHAW & CULBERTSON LLP

By: /s/ Terese A. Drew
TERESE A. DREW #32030MO
JOHN R. SUERMANN, JR. #66266MO
701 Market Street, Suite 1375
St. Louis, MO 63101-1843
P: (314) 241-2600
F: (314) 241-7428
tdrew@hinshawlaw.com
jsuermann@hinshawlaw.com
ATTORNEYS FOR DEFENDANT
PHARMA MEDICA RESEARCH, INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was electronically filed and served to counsel via the Court's e-filing system on this 12th day of April, 2019, addressed to the following attorney(s) of record:

Brian M. Wendler
Angie M. Zinzilieta
Paul Rademacher
Wendler Law, P.C.
900 Hillsboro, Suite 10
Edwardsville, IL 62025
P: (618) 692-0011
F: (618) 692-0022
wendlerlawpc@gmail.com

Attorneys for Plaintiff

/s/ Mary Beth McFarland